

ALEX R. KESSEL, ESQ. (State Bar No. 110715)
LAW OFFICES OF ALEX R. KESSEL
15910 Ventura Blvd., Suite 1030
Encino, California 91436
Telephone: (818) 995-1422
Facsimile: (818) 788-9408
Email: KesselLawFirm@gmail.com

Attorney for Defendant,
CAROLINE HERRLING,

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

CAROLINE HERRLING,
Defendant.

CASE NO.: 2:23-cr-00059-MEMF
STIPULATION TO CONTINUE
SENTENCING HEARING; PROPOSED
ORDER

Current Hearing Date: September 28, 2023
Current Hearing Time: 10:00 a.m.

Proposed Hearing Date: December 8, 2023
Proposed Hearing Time: 2:00 p.m.

TO THE HONORABLE MAAME EWUSI-MENSAH FRIMPONG, JUDGE OF THE
UNITED STATES DISTRICT COURT:

Defendant CAROLINE HERRLING, individually and by and through her attorney of record, Alex R. Kessel, and Plaintiff, United States of America, by and through its attorney of record, Andrew Brown, hereby stipulate as follows:

1. On September 28, 2023, defense counsel will be engaged in a murder trial in the matter of *People v. Jose David Lopez*, Case No.: BA392921-03, in Department 106 of the Los Angeles Superior Court, Clara Shortridge Foltz Criminal Justice

Center. This is a multiple defendant murder case wherein the defendant is in custody. Trial in this matter is expected to last three weeks.

2. In late September, early November 2023, defense counsel will be engaged in an attempted murder trial in the matter of *People v. John Robert*, Case No.:

BA477679-05, in Department 105 of the Los Angeles Superior Court, Clara Shortridge Foltz Criminal Justice Center. This is a multiple defendant attempted murder case wherein the defendant is in custody. Trial in this matter is expected to last two weeks.

3. Defense counsel needs additional time to address sentencing issues raised in the pre-sentence report.

4. Defense counsel is out of the district between November 17 and November 27, 2023.

5. The government has no objection to this request for a continuance of the sentencing hearing.

6. The defendant consents to this requested continuance of her sentencing hearing.

Based on the foregoing, counsel for defendant and the government stipulate that the currently scheduled sentencing date be continued from September 28, 2023, at 10:00 a.m., to December 8, 2023, at 2:00 p.m.

IT IS SO STIPULATED:
DATED: August 28, 2023

/s/ Alex R. Kessel
Alex R. Kessel
Attorney for Defendant,
CAROLINE HERRLING

1 IT IS SO STIPULATED:
2 DATED: August 28, 2023

/s/ Andrew Brown
Andrew Brown
Assistant United States Attorney,
Attorney for Plaintiff,
UNITED STATES OF AMERICA